

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Merillat Industries, Inc.
Shenandoah County, Virginia
Permit No. VRO81062

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Merillat Industries, Inc. has applied for renewal of the Title V Operating Permit for its manufacturing wood cabinet components for kitchen and bath cabinets facility in Shenandoah County, Virginia. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

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Air Permit Manager: _____ Date: _____

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Larry M. Simmons, P.E.

FACILITY INFORMATION

Permittee

Merillat Industries, Inc.
P. O. Box 1946
Adrian, Michigan 49221

Facility

Merillat Corporation
State Route 720 at Interstate 81
Shenandoah County, Virginia

Plant ID No. 51-171-0063

SOURCE DESCRIPTION

SIC Code: SIC Code 2434 - Wood Kitchen Cabinets

NAISC Code 337110 - Wood Kitchen Cabinet and Countertop Manufacturing

Merillat manufactures wood cabinet components for kitchen and bath cabinets.

The facility is a Title V major source of volatile organic compounds (VOC) and total hazardous air pollutants (THAP). This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under a PSD Permit issued on December 10, 1984 and amended on December 16, 1985 and July 11, 1991, and November 18, 2002. A minor modification to the PSD Permit was issued on June 12, 1997. This permit incorporated all the previous permits. Additional minor modifications were made to this permit dated June 12, 1997 and April 6, 1998 which was administratively amended on December 22, 1998. For the purposes of this document, the PSD permit with subsequent modifications and amendments will be referred to as the PSD permit dated November 18, 2002.

COMPLIANCE STATUS

The facility is inspected biennially. The most recent inspection was conducted on May 31, 2002 and the facility was found to be operating in compliance with all applicable requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
B1	BS1	Industrial Wood-fired Boiler Model 3-3900-150-HRT (1987)	28.5 mm Btu/hr	Zurn Multicyclone	M1	PM PM-10	11/18/02
B2	BS2	Superior Boiler Works (1987)	14.7 mm Btu/hr	---	---	---	11/18/02
Woodworking Operations							
W1	BHS1	Miscellaneous Woodworking Equipment	Various	Pneumafil fabric filter Model 13.5-448-10	BH1	PM PM-10	11/18/02
W1	BHS2	Miscellaneous Woodworking Equipment	Various	Pneumafil fabric filter Model 13.5-448-10	BH2	PM PM-10	11/18/02
W1	BHS3	Miscellaneous Woodworking Equipment	Various	Pneumafil fabric filter Model 13.5-448-10	BH3	PM PM-10	11/18/02
W1	BHS4	Miscellaneous Woodworking Equipment	Various	Pneumafil fabric filter Model 13.5-448-10	BH4	PM PM-10	11/18/02
W1	BHS5	Miscellaneous Woodworking Equipment	Various	Pneumafil fabric filter Model 15-470-12	BH5	PM PM-10	11/18/02
W1	BHS6	Miscellaneous Woodworking Equipment	Various	Waltz-Holst Fabric Filter Model 12-456-7045	BH6	PM PM-10	11/18/02
W1	BHS7	Waste Wood Loadout System	Various	Pneumafil fabric filter Model 11.5-316-8	BH7	PM PM-10	11/18/02
Finishing Operations							
F1	FS1-FS8	Four Spray Booths	Various	Water Wash/Dry Filter	F01-F04	PM PM-10	11/18/02
F1	FS9-FS11	Two Spray Booths	Various	Dry Filter	F05-F06	PM PM-10	11/18/02

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
F1	BHS8	Automatic Sealer/Sander	Various	Pneumafil fabric filter Model 8.5-156-10	BH8	PM PM-10	11/18/02
F1	OS1-OS26	Steam Heated Drying Ovens	Various	---	---	---	11/18/02
Kilns							
DK1, DK2		Dry kilns		---	---	---	---

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2003 annual emission update is included as Attachment A. Emissions are summarized in the following tables.

2003 Actual Emissions

Emission Unit	Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM-10	NO _x
Boilers (Units B1 & B2)	0.69	12.64	1.89	6.42	2.4
Woodworking (Unit W1)	---	---	---	3.07	---
Finishing (Unit F1)	509.67	---	---	6.11	---
Total	510.36	12.64	1.89	15.6	2.4

2003 Facility Hazardous Air Pollutant (HAP) Emissions

Pollutant	HAP Emission in Tons/Year
Total HAPs	160.5

EMISSION UNIT APPLICABLE REQUIREMENTS

Fuel Burning Equipment (Units B1 and B2)

Limitations

The following limitations are state BACT requirements from the PSD permit dated November 18, 2002. Please note that the conditions numbers are from the 2002 permit; a copy of the permit is enclosed as Attachment B.

- Condition 3: Particulate emissions from the Industrial wood-fired boiler (Unit B1) shall be controlled by a multicyclone.
- Condition 6: Approved fuels for the Industrial wood-fired boiler (Unit B1) are waste wood and sawdust.
- Condition 7: Approved fuels for the Superior boiler (Unit B2) are natural gas and distillate oil.
- Condition 8: Limit on sulfur content for distillate oil for Superior boiler (Unit B2).
- Condition 4: Emission limits for criteria pollutants from the Industrial wood-fired boiler (Unit B1).
- Condition 5: Emission limits for criteria pollutants from the Superior boiler (Unit B2).
- Condition 10: Visible emission limit for the Industrial wood-fired boiler (Unit B1) and the Superior boiler (Unit B2).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-20 E, Compliance. This requires proper operation and maintenance of any affected facility.

Units B-1 and B-2 are subject to 40 CFR Part 63 Subpart DDDD, National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. Although these units are subject by definition, no specific requirements apply. Therefore, only language stating that the units are subject has been included in the permit.

Periodic Monitoring

The monitoring requirements in Conditions 9, 23, and Attachment B of the PSD permit dated November 18, 2002 have been modified to meet Part 70 requirements.

The permit requires proper operation of the boiler in conjunction with the operation of a multicyclone to comply with the particulate matter and the visible emission requirements for the Industrial wood-fired boiler (Unit B1).

Periodic monitoring for the visible emission limit on the Industrial wood-fired boiler includes a visible emission observation of the boiler stack. The visible emission observation will include a determination of the presence of visible emissions. If visible emissions are observed, an EPA Method 9 (40 CFR Part 60, Appendix A) visible emission evaluation (VEE) will be conducted unless the condition is corrected in a timely manner such that no visible emissions are present. The cause and corrective measures taken are to be recorded. For each VEE conducted, a minimum of six minutes of observation is required. If any of the observations exceed the applicable opacity limit, the observation period will continue for a total of sixty minutes of observation.

An annual internal inspection is required on the multicyclone to ensure structural integrity.

Equations for calculating actual annual particulate emissions (PM and PM-10) for the Industrial wood-fired boiler (Unit B1) were developed in one of the minor modifications to the PSD permit and have been included in the Title V permit (Attachment B of the 11/18/02 Permit). Annual emissions will be calculated on a monthly basis. These calculations provide the basis for determining compliance with the annual particulate emission limits for the Industrial wood-fired boiler.

All other actual emissions from the operation of the Industrial wood-fired boiler (Unit B1) will be calculated using the following equation:

$$E = F \times W$$

..... Equation 1

Where:

E = Emission rate (lb/time period)
F = Pollutant specific emission factors as follows:

PM	=	2.0 lb/ton waste wood
PM-10	=	2.0 lb/ton waste wood
SO ₂	=	0.15 lb/ton waste wood
CO	=	4.0 lb/ton waste wood
NO _x	=	0.68 lb/ton waste wood
VOC	=	1.4 lb/ton waste wood

W = waste wood* combusted (MMBtu/time period)

BTU value of wood waste is 8400 BTU/lb

*Waste wood is defined as internally produced milled wood from the manufacturing process.

Hourly limits and annual limits other than particulate matter for the Industrial wood-fired boiler are based on the capacity of the boiler. Therefore, if the boiler is operated at capacity, or below, there should not be a violation of the hourly or annual emission rates. Calculations have been included in Attachment C to demonstrate how the limits were obtained.

Actual emission from the operation of the Superior boiler (Unit B2) will be calculated using the following equations:

1. For natural gas combustion:

$$E = F \times N \quad \text{..... Equation 2}$$

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

PM = 6.2 lb/million ft³

PM-10 = 6.2 lb/million ft³

SO₂ = 0.6 lb/million ft³

N = Natural gas consumed (million ft³/time period)

2. For distillate oil combustion:

$$E = F \times O \quad \text{..... Equation 3}$$

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

PM = 2.0 lb/1000 gal

PM-10 = 1.0 lb/1000 gal

SO₂ = 143.6 S lb/1000 gal (S = weight percent sulfur)

O = Distillate oil consumed (1000 gal/time period)

The hourly and annual emission limits established for all criteria pollutants for the Superior boiler (Unit B2) are based on the capacity of the boiler. Therefore, if the boiler is operated at capacity, or below, there should not be a violation of the hourly or annual emission rates.

Compliance with the emission limits established for the SO₂ are demonstrated by complying with the distillate oil sulfur content limit contained within the permit. If the sulfur content limit of the fuel is not exceeded, the SO₂ limit can not be exceeded. Calculations have been included in Attachment C to demonstrate how the limits were obtained.

No additional monitoring is required for the VEE limit for the Superior boiler (Unit B2). This unit burns only #2 fuel oil and natural gas. Visible emissions are not expected from this unit.

Compliance Assurance Monitoring (CAM)

Although Unit B1 has a multicyclone for control of particulate emissions, CAM does not apply to Unit B1 because the uncontrolled particulate emissions are less than 100 tons/yr. (See Attachment C) Unit B2 has no add-on control equipment and is therefore not subject to CAM.

Recordkeeping

The recordkeeping requirements in Condition 24 of the PSD permit dated November 18, 2002 have been modified to meet Part 70 requirements.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the monthly and annual throughput of natural gas and distillate oil for the Superior boiler (Unit B2); DEQ approved, pollutant-specific emission factors and equations; fuel supplier certifications; number of hours per day of operation of Industrial wood-fired boiler (Unit B1); hourly steam pressure of the Industrial wood-fired boiler (Unit B1); multicyclone pressure drop (recorded once every eight hours of boiler operation (Unit B1); Industrial wood-fired boiler stack inspection results including the date, time, and name of person performing each inspection; whether or not visible emissions were observed and an EPA Method 9 observation record; multicyclone inspection results including the date, time, and name of person performing each inspection; a list of the items inspected and any maintenance or repairs performed as a result of the inspection; and monthly and annual cumulative emission of PM and PM-10 from the Industrial wood-fired boiler (Unit B1).

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit for the fuel burning equipment.

Streamlined Requirements

There are no streamlined requirements.

Woodworking Equipment Requirements - Unit W1

Limitations

The following limitations are state BACT requirements from the PSD permit dated November 18, 2002. Please note that the conditions numbers are from the 2002 permit; a copy of the permit is enclosed as Attachment B.

- Condition 11: Particulate emissions from woodworking equipment (Unit W1) shall be controlled by fabric filters.
- Condition 12: Transfer of collected material from woodworking equipment (Unit W1) shall be controlled by fabric filter and/or a completely enclosed transfer system.
- Condition 13: Fugitive particulate emissions from the collection and transfer of collected wood waste shall be controlled by complete enclosure.
- Condition 15: Limit on wood throughput for the manufacture of wood cabinets.
- Condition 18: Visible emission limit for fabric filter stacks associated with woodworking equipment (Unit W1).
- Condition 19: Fugitive visible emission limit for woodworking equipment (Unit W1).
- Condition 17: Emission limits for fabric filters associated with woodworking equipment (Unit W1).
- Condition 34: Requires the development of a maintenance schedule, an inventory of spare parts for air pollution control equipment, written operating procedures for air pollution control equipment, and for operators to be trained in the proper operation of that equipment.

Please note that the permittee has renumbered the fabric filter units on the renewal Title V application from what was used in the PSD permit dated 11/18/02. Following is a table that shows what the old numbers were and what the current numbers are.

Previous Reference Number	Current Reference Number
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(11/18/02 Permit)	
BH1	BH1
BH2	BH2
BH3	BH3
BH4	BH4
BH5	BH5
BH7	BH6
BH8	BH7
BH6	BH8

Compliance Assurance Monitoring

The seven fabric filters (BH1-BH7) are subject to Compliance Assurance Monitoring (CAM) plans. These fabric filters vent to atmosphere and have the potential to emit more than 100 tons per year particulate matter.

The Fabric Filter CAM plan (Attachment D) includes the following requirements:

Visible emissions have been selected as the first indicator because they are indicative of good operation and maintenance of a fabric filter. If the fabric filter is not functioning properly, visible emissions will be present and there is a chance that Merrillat is in danger of not meeting the 0.0022 gr/dscf limit. (Particulate testing performed in 1997 on two of the baghouses verify that this emission limit can be met.) Therefore, visible emissions are an acceptable performance indicator.

The daily visible emission evaluations of each fabric filter will also satisfy the CAM requirement for the visible emission limitation. Frequent checks for visible emissions will limit malfunctions of the control equipment. As long as the control equipment is operating properly, there is little likelihood of violating the visible emission limitation. The control equipment will limit the amount of particulates that are emitted, thereby limiting visible emissions. If visible emissions are observed a Method 9 VEE is required on that particular control device.

The monthly and annual periodic structural inspections of the fabric filters satisfy the second CAM indicator for the woodworking control equipment. These inspections will alert personnel of bag deterioration and early maintenance requirements necessary to obtain proper control efficiencies.

There is also a requirement in the permit for Merrillat to maintain devices to continuously measure the pressure drop across each fabric filter for verification of the operational status of each fabric filter.

Recordkeeping

The recordkeeping requirements in Condition 24 of the PSD permit dated November 18, 2002 have been modified to meet Part 70 requirements.

The permittee is required to keep records of the annual throughput of wood used for the manufacture of wood cabinets, the daily inspections performed on each stack and necessary records required by the CAM plan. Records are also required for scheduled and non-scheduled maintenance on the air pollution control equipment and training of operators of the equipment to include names of trainees, date of training, and nature of training.

Testing

The November 18, 2002 PSD permit requires an initial stack test for the new fabric filter (BH6). A concurrent VEE is also required. The permit also contains a condition that if requested by DEQ that the permittee shall conduct additional visible emission evaluations from the fabric filter (BH6) to demonstrate compliance with the visible emission limits contained in this permit. A table of test methods has been included in the permit if additional testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included in the permit for the woodworking equipment.

Streamlined Requirements

The 5% opacity limit for the fabric filter stacks and the 10% opacity limit for the fugitive emission points are more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80. Therefore, only the more stringent 5% and 10% opacities were included in the permit.

Also, the notification requirement for commencing installation has not been included, as this notification has already been provided. Additionally, the permit invalidation requirement has also not been included because installation has commenced and the unit will be in operation prior to issuance of this permit.

Finishing Operation Requirements - Unit F1

Limitations

The following limitations are state BACT requirements from the PSD permit dated November 18, 2002. Please note that the conditions numbers are from the 2002 permit; a copy of the permit

is enclosed as Attachment B.

Condition 21: Emission limit for volatile organic compounds for the finishing operation (F1).

Condition 20: Limit on hours of operation for the finishing operation (F1).

Condition 23: Requires the permittee to continually seek new technology to include selection and use of finishes with less photochemically reactive solvents, spraying equipment and techniques with improved transfer efficiencies and water-base coatings.

Condition 34: Requires the development of a maintenance schedule and an inventory of spare parts for air pollution control equipment, written operating procedures for air pollution control equipment, and for operators to be trained in the proper operation of that equipment.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable to the finishing operation (Unit F1) and have been included in the permit:

Standard for Visible Emissions	20% Opacity	9 VAC 5-50-80
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The permit requires operation of a combination water wash/dry filter, dry filter, or fabric filter to demonstrate compliance with the visible emission requirement, under the authority of 9 VAC 5-80-110.

Monitoring and Recordkeeping

The permit requires operation of a combination water wash/dry filter, dry filter, or fabric filter to demonstrate compliance with the visible emission requirements due to finishing over spray. A properly operating combination water wash/dry filter, dry filter, or fabric filter can comply with the 20% opacity limit. The permittee will inspect each control device (F01-F06, BH8) each day the spray booths and/or automatic sealer/sander are operated. The inspections shall include a check of correct filter placement, filter condition, and observation of the pressure drop across the filters. A log recording the results of the inspection including pressure drop and any maintenance or corrective action taken shall be kept.

An equation for calculating emissions from VOCs has been included in the permit. The permit also includes a requirement to keep a certified product data sheet showing VOC content for each finishing material used, to monitor and record the monthly and annual throughput of finish materials, emissions of VOCs, and the number of hours per day of operation of the finishing operation. Records are also required for scheduled and non-scheduled maintenance on the air pollution control equipment and training of operators of the equipment to include names of

trainees, date of training, and nature of training.

The daily inspections and recordkeeping required by the permit will satisfy the periodic monitoring requirement for the furniture finishing equipment.

Compliance Assurance Monitoring

Although Unit F1 has filters and waterwash for control of particulate emissions, CAM does not apply to Unit F1 because the uncontrolled particulate emissions are less than 100 tons/yr and these units are subject to a MACT (Subpart JJ). (See Attachment C.)

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting requirements of Condition 25 of the PSD permit dated 11/18/02 have been included. The permit requires quarterly reports documenting the following:

- a. The monthly and annual throughput (in gallons), density, and percent VOC by weight of each strain, sealer, top coats, touch-up finish, and clean-up solvent used by the facility.
- b. The monthly and annual emissions (in pounds) of VOC from the finishing operation.

Streamlined Requirements

There are no streamlined requirements for this section.

Dry Kiln Requirements – Units DK1 & DK2

Applicability & Notifications

The two dry kilns are subject to the Plywood and Composite Wood Products MACT (Subpart DDDD). However, it appears that the only requirement for these units is the initial notification requirements. These requirements have been included in the permit.

FACILITY WIDE CONDITIONS

Limitations

The permittee is subject to the 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Wood Furniture MACT). All applicable limitations from the Wood Furniture MACT have been included in the permit. Being subject to the Wood Furniture MACT means that the permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Any applicable limitations from the general provisions have also been included in the permit.

Monitoring

The Wood Furniture MACT contains requirements for continuous compliance, including monthly and/or daily recordkeeping depending on the method of compliance. These requirements have been incorporated into the permit. The Wood Furniture MACT contains adequate monitoring to meet the periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit.

Recordkeeping

The Wood Furniture MACT contains requirements for recordkeeping, including maintenance or certified product data sheets for each material used and all calculations used to demonstrate continuous compliance. No additional recordkeeping has been included in the Title V permit.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The Wood Furniture MACT requires that a source report compliance status annually, as well as demonstrating continuous compliance semi-annually. These requirements have been included in the permit and will be submitted concurrently with the reporting requirements contained in the 9 VAC 5-80-110.

Streamlined Requirements

The initial notification requirements associated with the Wood Furniture MACT have not been included in the permit because the source has already completed the notifications.

The permittee has opted not to use a control device to meet the MACT requirements. Therefore, all requirements regarding a control device have not been included in the permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

STATE ONLY APPLICABLE REQUIREMENTS

The permittee requested that State Only Applicable Requirements not be included in their Title V operating permit.

FUTURE APPLICABLE REQUIREMENTS

40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR Part 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products will become applicable during the term of the permit and placeholder and/or applicable requirements for each rule have been included in the permit.

INAPPLICABLE REQUIREMENTS

The permittee did not identify any inapplicable requirements in their application. Therefore, no inapplicable requirements are included in the permit.

COMPLIANCE PLAN

The permittee is currently in compliance with all applicable requirements. No compliance plan was included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PW1, PW2, PW3	Parts Washers	9 VAC 5-80-720 B	VOC	---
G1*	Gluing (water-based glues)	9 VAC 5-80-720 B	VOC	---

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

* G1 gluing operations were previously listed under significant emission units in the initial Title V permit as this operation was thought to have been covered under the Subpart JJ MACT.

However, information supplied by the permittee indicates that the glues used at Merillat do not meet the definition of contact adhesive contained in Subpart JJ. The glues used at Merillat are water-based and are therefore an insignificant emission unit.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice appeared in the Northern Virginia Daily on **April 23, 2004** announcing a 30-day public comment period for this permit. The public comment period ended on **May 24, 2004**, and EPA's comment period ended on **June 8, 2004** (concurrent review of the permit as both draft and proposed).